

John E. Hall (Bar No. 118877)
 jhall@cov.com
 COVINGTON & BURLING LLP
 415 Mission Street, Suite 5400
 San Francisco, CA 94105-2533
 Telephone: (415) 591-6000

Ali Mojibi (Bar No. 265332)
 amojibi@cov.com
 COVINGTON & BURLING LLP
 1999 Avenue of the Stars
 Los Angeles, CA 90067-4643
 Telephone: (424) 332-4800

Kathryn E. Cahoy (Bar No. 298777)
 kcahoy@cov.com
 Kurt G. Calia (Bar No. 214300)
 kcalia@cov.com
 COVINGTON & BURLING LLP
 3000 El Camino Real, 10th Floor
 5 Palo Alto Square
 Palo Alto, CA 94306-2112
 Telephone: (650) 632-4700

Indranil Mukerji (*Pro Hac Vice*)
 imukerji@cov.com
 Stephen A. Marshall (*Pro Hac Vice*)
 smarshall@cov.com
 COVINGTON & BURLING LLP
 One CityCenter
 850 Tenth Street, NW
 Washington, DC 20001-4956
 Telephone: (202) 662 6000

*Attorneys for TikTok Inc., TikTok Pte. Ltd.,
 ByteDance Ltd., and ByteDance Inc*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

BEIJING MEISHE NETWORK TECHNOLOGY
 CO. LTD.,

Plaintiff,

v.

TIKTOK INC., TIKTOK PTE. LTD.,
 BYTEDANCE LTD., AND BYTEDANCE INC,

Defendants.

Case No. 3:23-cv-06012-SI

**NOTICE OF SETTLEMENT AND
 JOINT STIPULATION AND
 [PROPOSED] ORDER TO STAY
 PENDING FINAL SETTLEMENT**

Pursuant to Civ. L.R. 7-12, Plaintiff Beijing Meishe Network Technology Co. Ltd. (“Plaintiff”) and Defendants Tik Tok Inc., Tik Tok Pte. Ltd., Bytedance Ltd., and Bytedance Inc. (“Defendants”) (collectively, “the Parties”), by and through their undersigned counsel of record, hereby stipulate as follows:

WHEREAS, the Parties have reached an agreement in principle to resolve this matter;

WHEREAS, to facilitate the final settlement and resolution of this matter and to allow the parties to focus their efforts finalizing and effectuating that resolution, the Parties request a stay of this action and request that all current dates and deadlines, including the October 27, 2025 trial date and all associated pre-trial deadlines and other hearing dates and associated deadlines, be vacated;

WHEREAS, the Parties intend to be in a position to file a stipulated notice of dismissal with prejudice of all claims and counterclaims within thirty (30) days or otherwise provide a status report to the Court at that time regarding the anticipated timing;

WHEREAS, in light of the Parties’ agreement in principle, further litigation activities at this stage would be an inefficient use of the Court’s and the Parties’ time and resources (*see Landis v. N. Am. Co.*, 299 U.S. 248 , 254 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.”));

NOW, THEREFORE, subject to approval by the Court, it is hereby stipulated and agreed by the Parties through their respective undersigned attorneys of record that:

1. This action is hereby stayed, and all current dates and deadlines, including the October 27, 2025 trial date, are hereby vacated.
2. Within thirty (30) days of the date of the Court’s order, the Parties shall file either a joint notice of dismissal with prejudice or a status report informing the Court of the anticipated timing of the joint notice.

1 Dated: September 26, 2025

Respectfully submitted,

2
3 /s/ Kathryn E. Cahoy

4 COVINGTON & BURLING LLP
5 John E. Hall (SBN 118877)
6 jhall@cov.com
7 415 Mission Street, Suite 5400
8 San Francisco, CA 94105
9 Telephone: (415) 591-6000
10 Facsimile: (415) 591-6091

11 Kathryn E. Cahoy (SBN 298777)
12 kcahoy@cov.com
13 Kurt G. Calia (SBN 214300)
14 kcalia@cov.com
15 3000 El Camino Real, 10th Floor
16 5 Palo Alto Square
17 Palo Alto, California 94306-2112
18 Telephone: (650) 632-4700
19 Facsimile: (650) 632-4800

20 Ali Mojibi (Bar No. 265332)
21 amojibi@cov.com
22 1999 Avenue of the Stars
23 Los Angeles, CA 90067-4643
24 Telephone: (424) 332-4800

25 Indranil Mukerji (*Pro Hac Vice*)
26 imukerji@cov.com
27 Stephen A. Marshall (*Pro Hac Vice*)
28 smarshall@cov.com
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: (202) 662 6000

WHITE & CASE LLP
Yar R. Chaikovsky (175421)
yar.chaikovsky@whitecase.com
Philip Ou (259896)
philip.ou@whitecase.com
David T. Okano (278485)
david.okano@whitecase.com

3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109
Telephone: (650) 213-0300
Facsimile: (650) 213-8158

Michael Songer
michael.songer@whitecase.com
701 Thirteenth Street, NW
Washington, DC 2005-3807
Telephone: (202) 626-3600
Facsimile: (202) 639-9355

Andrew Zeve
andrew.zeve@whitecase.com
Jeremy Dunbar
jeremy.dunbar@whitecase.com
609 Main Street, Suite 2900
Houston, Texas 77002
Telephone: (713) 496-9700
Facsimile: (713) 496-9701

*Attorneys for TikTok Inc., TikTok Pte. Ltd.,
ByteDance Ltd., and ByteDance Inc.*

/s/ Robert M. Harkins, Jr.

CHERIAN LLP
Korula T. Cherian (SBN 133697)
Robert M. Harkins, Jr. (SBN 179525)
2001 Addison St., Suite 275
Berkeley, CA 94704
Telephone: (510) 944-0190
sunnyc@cherianllp.com
bobh@cherianllp.com

Thomas M. Dunham (pro hac vice)
J. Michael Woods (pro hac vice)
Adam A. Allgood (SBN 295016)
1901 L St. NW, Suite 700
Washington, DC 20036
(202) 838-1560
tomd@cherianllp.com
michaelw@cherianllp.com

adama@cherianllp.com

*Attorneys for Plaintiff Beijing Meishe Network
Technology Co., Ltd.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

Hon. Susan Illston
United States District Court Judge

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from counsel for Plaintiff Beijing Meishe Network Technology Co., Ltd.

Dated: September 26, 2025

/s/ Kathryn E. Cahoy

Kathryn E. Cahoy

*Counsel for TikTok Inc., TikTok Pte. Ltd.,
ByteDance Ltd., and ByteDance Inc.*